

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----	X	
	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
-----	X	

**CERTIFICATE OF NO RESPONSE TO DEBTOR’S THIRTEENTH OMNIBUS  
OBJECTION TO CERTAIN CLAIMS  
(NO BASIS CLAIMS)**

(Docket No. 9568)

The undersigned certifies that on March 30, 2015, he caused the Debtor’s Thirteenth Omnibus Objection to Certain Claims (No Basis Claims) [Docket No. 9568] (the “Objection”) and a Notice of the Objection (the “Notice”) [Docket No. 9568], to be filed with the Court and served upon every claimant listed on Exhibit 2 of the Objection via First Class Mail at the addresses listed therein (the “Claimants”). See Certificates of Service [Docket Nos. 9572] attached hereto as **Exhibit B**.

Pursuant to Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Michigan (the “Local Rules”) and the Notice, the Claimants were required to file responses to the relief requested in the Objection, if any, on or before April 29, 2015.

The Debtor received formal responses to the Objection from Richard Hall regarding Claim Nos. 1097 and 474 [Docket Nos. 9712 and 9713, respectively], Lue David Jackson regarding Claim No. 1074 [Docket No. 9627], and Sherrell Ann Peyton regarding Claim No. 779 [Docket No. 9745].

4820-3738-1923.1

The Debtor subsequently filed a Reply to the responses from Lue David Jackson [Docket No. 9782] and Sherrell Ann Peyton [Docket No. 9780]. Further, the Debtor filed a Stipulation to Adjourn the Hearing on Mr. Hall's response regarding Claim Nos. 1097 and 474 to May 27, 2015 [Docket No. 9761]. The Court entered the Order Approving to Adjourn the Hearing on Mr. Hall's claims [Docket No. 9762]. No other responses to the Objection were filed and served.

WHEREFORE, pursuant to Local Rule 3007-1(c), the undersigned respectfully requests that this Court enter an order in the form attached hereto as **Exhibit A**, granting the Objection as to the claims for which no responses were received.

Dated: May 5, 2015  
Detroit, Michigan

FOLEY & LARDNER LLP

/s/ John A. Simon  
John A. Simon (P61866)  
Jeffrey S. Kopp (P59485)  
Tamar N. Dolcourt (P73425)  
Leah R. Imbrogno (P79384)  
One Detroit Center  
500 Woodward Ave., Suite 2700  
Detroit, MI 48226-3489  
(313) 234-7100 (Telephone)  
(313) 234-2800 (Facsimile)

*Counsel for the Debtor, City of Detroit  
Michigan*